

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF DELAWARE

MICHAEL LEE ROSE

PLAINTIFF

V.

FIRST CORRECTIONAL MEDICAL
CORRECTIONAL MEDICAL SERVICES
DR. NIAZ

DEFENDANT

Case No. CA 06-370JJF

Case I.D. No.

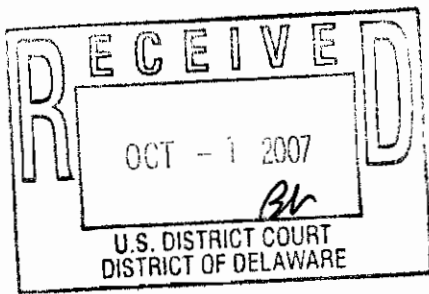
#370-(JJF)

MOTION FOR ADMISSION

Plaintiff Michael Lee Rose (here after referred to a Rose) request Defendant First Correctional Medical (here after referred to as F.C.M.) to make the following admissions within thirty (30) days after service of this request. For the purpose of this action only and subject to all pertinent objections as to admissibility which may be interposed at trial.

Each of the following statements are true:


1. Mr. Rose was sufficiently harmed while F.C.M. was the medical provider for the Delaware Correctional system.
2. Admit F.C.M. doctors are qualified to make a diagnosis of Hepatitis C.
3. Admit the lab F.C.M. uses for blood work are qualified and F.C.M. does except their results.



4. Admit being the Delaware Correctional system health care provider from July 1st, 2002 until June 30th, 2005. Mr. Rose was never treated for Hepatitis C in any way.
5. Admit F.C.M. knew Mr. Rose this serious medical problem.
6. Admit grievances were filed but were never answered.
7. Admit that when Hepatitis C remains untreated it is the leading cause of liver transplants and can be fatal.
8. Admit that when not treated this disease leads to constant and adsorbent amounts of pain and the patient may remain in a state of impair.
9. Admit The Medical Grievance Board at the Delaware Correctional Center ^{in 2002-2005} ~~did not~~ ^{F.C.M.} ~~work for~~ ~~2005~~ except for the correctional officers that are at the hearings.
10. Admit the Defendants feel that inmates health care treatment should be far below someone who is not incarcerated.
11. Admit F.C.M. does work under the color of the state.

VERY RESPECTFULLY SUBMITTED

DATED: September 27, 2007


MICHAEL LEE ROSE
SBI#097880
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DE 19977

Certificate of Service

I, Michael Lee Rose, hereby certify that I have served a true

And correct cop(ies) of the attached: Motion for admission

_____ upon the following
parties/person (s):

TO: United States District
Court For The District of
Delaware
844 North King St. Lock Box 18
Wilmington, DE, 19801-3570

TO: Daniel L McKenty
McCollough & McKenty P.A.
1225 N. King St Suite 100, PO
Box 397
Wilm, DE 19899-0397

TO: Kevin Connors, Lorenza A.
Wolhan Marshall, Dennehey
Wanner, Coleman Goggin
1220 N. Market St, 5th Flr PO
Box 888, Wilm. DE 19899-8888

TO: Lorenza A. Wolhan Marshall,
Dennehey, Wanner, Colman
888 Goggin
1220 N Market St, 5th Flr PO
Box 888 Wilm DE 19899 8888

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 27 day of Sept - 2007, 2007

Michael Lee Rose

IM Michael Lee Rose
SBI# 097888 UNIT T-2
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

United States District Court
844 North King St. Lock Box 18
Wilmington, DE

1980-2570

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10/1/2007 10:11 AM

U.S. DISTRICT COURT
WILMINGTON, DE

